

**KANTROWITZ, GOLDHAMER
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(additional counsel on signature page)

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE GALENA BIOPHARMA, INC.
SECURITIES LITIGATION

Case No.: 2:17-cv-00929-JMV-JBC

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR PRELIMINARY
APPROVAL OF SETTLEMENT**

Motion Day: October 18, 2021

Hon. John Michael Vazquez

PLEASE TAKE NOTICE that on October 18, 2021, or as soon thereafter as they may be heard, Lead Plaintiffs Dan Grunfeld, Shawn Kracht, Joseph Selinger, James Huisman, and Brooks Lieske (“Plaintiffs”), will move the Court for entry of an Order: (i) preliminarily approving the Settlement between Plaintiffs and Defendants SELLAS Life Sciences Group, Inc. f/k/a Galena Biopharma, Inc., Mark W. Schwartz and Christopher S. Lento; (ii) conditionally certifying the Class for purposes of the Settlement; (iii) approving the notice of the proposed Settlement to the Class; and (iv) scheduling a final approval hearing for a date at the Court’s convenience.

In support of this motion, Plaintiffs submit: the accompanying Memorandum of Law; the Declaration of William B. Federman in Support of Preliminary Approval and the exhibits thereto, including the Stipulation and Agreement of Settlement and exhibits thereto; the pleadings and records on file in the above-captioned action; and other such matters as the Court may consider at the hearing on this motion. Plaintiffs also submit a Proposed Order with this motion.

Dated: September 15, 2021

Respectfully submitted,

/s/William B. Federman

William B. Federman (*pro hac vice*)

A. Brooke Murphy (*pro hac vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on September 15, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/William B. Federman

William B. Federman